

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION

UNITED STATES OF AMERICA	§	
Plaintiff,	§	
	§	
v.	§	NO: 6:24-CV-00200
	§	
\$116,764.56 IN UNITED STATES	§	
CURRENCY	§	
Defendant.	§	

**VERIFIED COMPLAINT FOR FORFEITURE IN REM**

In accordance with Fed. R. Civ. P. Supplemental Rule G(2), the United States of America, Plaintiff, brings this complaint and alleges as follows:

**Nature of the Action**

1. This is an action to forfeit property to the United States for violations of 18 U.S.C. §§ 1343, 1349, 1956, and 1957.

**Defendant In Rem**

2. The Defendant Property is a total of \$116,764.56 in United States Currency consisting of the following personal property:

- a. \$74,684.89 in JP Morgan Chase (JPMC) Bank account XXXXX3320;
- b. \$21,478.95 in JPMC Bank account XXXXX2880;
- c. \$5,000.13 in JPMC account XXXXX0753; and
- d. \$15,600.59 in JPMC account XXXXX7702.

These funds were seized on or about March 5, 2024, in Tyler, Texas pursuant to a seizure warrant and remain in the custody of the United States Secret Service (USSS).

### Jurisdiction and Venue

3. The Court has subject matter jurisdiction over an action commenced by the United States pursuant to 28 U.S.C. § 1345, and over an action for forfeiture pursuant to 28 U.S.C. § 1355(a).

4. The Court has *in rem* jurisdiction over the Defendant Property pursuant to 28 U.S.C. § 1355(b)(1)(A) because acts or omissions giving rise to the forfeiture occurred in this district.

5. Venue is proper in this district pursuant to 28 U.S.C. § 1355(b)(1)(A) because acts or omissions giving rise to the forfeiture occurred in this district.

### Basis for Forfeiture

6. The Defendant Property is subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A) because it is personal property involved in a transaction or attempted transaction in violation of 18 U.S.C. §§ 1956 and 1957, or any property traceable to such property, and pursuant to 18 U.S.C. § 981(a)(1)(C) because it is personal property which constitutes or is derived from proceeds traceable to a violation of any offense constituting a specified unlawful activity (as defined in 18 U.S.C. § 1956(c)(7)), namely, a violation of 18 U.S.C. § 1343, or a conspiracy to commit such offense (18 U.S.C. § 1349).

### Facts

7. The facts and circumstances supporting the forfeiture of the above-described property are attached in the affidavit by USSS Special Agent Brad Schley.

Potential Claimants

8. The known potential claimants to the Defendant Property are:
  - a. Yuxuan Chen  
900 S. Figueroa, Apt. 808  
Los Angeles, California 90015
  - b. Yuxuan Chen  
811 West 7<sup>th</sup> Street, Suite 1200  
Los Angeles, California 90017
  - c. Eagleeye Group Limited  
811 West 7<sup>th</sup> Street, Suite 1200  
Los Angeles, California 90017
  - d. Bluewave Trade Limited  
811 West 7<sup>th</sup> Street, Suite 1200  
Los Angeles, California 90017

Claim for Relief

9. The United States respectfully requests that the Court forfeit the Defendant Property to the United States, award costs and disbursements in this action to the United States, and order any other relief that the Court deems appropriate.

Respectfully submitted,

DAMIEN M. DIGGS  
UNITED STATES ATTORNEY

/s/ Robert Austin Wells  
ROBERT AUSTIN WELLS  
Assistant United States Attorney  
Texas State Bar Number 24033327  
110 North College, Suite 700  
Tyler, Texas 75702  
(903) 510-9350  
robert.wells3@usdoj.gov

**VERIFICATION PURSUANT TO 28 U.S.C. § 1746**

I, Brad Schley, hereby state that:

1. I am a Special Agent with the United States Secret Service.
2. I have read this Complaint, and the information contained herein is true and correct to the best of my knowledge.
3. The information contained in this Complaint comes from the official files and records of the United States, statements from other law enforcement officers, and my investigation of this case.

I state and verify under penalty of perjury that the foregoing is true and correct.

bschley

Digitally signed by bschley  
Date: 2024.05.31 15:38:22 -05'00'

---

Brad Schley  
Special Agent  
United States Secret Service

Dated: \_\_\_\_\_